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**From:** Craig, Harry [Craig.Harry@epa.gov]  
**Sent:** 7/7/2016 8:40:57 PM  
**To:** Palumbo, Janice [Palumbo.Jan@epa.gov]; Halstead, Sandra [Halstead.Sandra@epa.gov]; Garvey, Melanie [Garvey.Melanie@epa.gov]; Williams, Cheryl B. [Williams.CherylB@epa.gov]; McArthur, Lisa [McArthur.Lisa@epa.gov]  
**CC:** Shuster, Kenneth [Shuster.Kenneth@epa.gov]  
**Subject:** FW: Sub X call

All,

I was on the RCRA Subpart X call today, here is the input from the State of Colorado on OB/OD units on active ranges at Ft Carson:

“Just an FYI about Wainwright also. Fort Carson has a permitted OD unit on an active range. The Army tried making some similar arguments, but we made them permit the unit for treatment of items/munitions coming from off site or munitions from Fort Carson that were not safe to use or UXO not safe to BIP on an active range.”

So there really is no “precedent setting” issues on Ft. Wainwright, either in AK, R10, or nationally.

Harry

**From:** Anderson - CDPHE, Deb [mailto:deb.anderson@state.co.us]  
**Sent:** Thursday, July 07, 2016 1:22 PM  
**To:** Shuster, Kenneth <Shuster.Kenneth@epa.gov>  
**Cc:** Gerhard, Sasha <Gerhard.Sasha@epa.gov>; Galbraith, Michael <Galbraith.Michael@epa.gov>; Gaines, Jeff <Gaines.Jeff@epa.gov>; Crosby-Vega, Terri <Crosby-Vega.Terri@epa.gov>; Craig, Harry <Craig.Harry@epa.gov>  
**Subject:** Re: Sub X call

Thanks for the clarification on the diesel fuel/PFC connection. You're right, it doesn't make any sense to use AFFF on a fire used to light dunnage - they want it to burn.

Deb

On Thu, Jul 7, 2016 at 2:05 PM, Shuster, Kenneth <[Shuster.Kenneth@epa.gov](mailto:Shuster.Kenneth@epa.gov)> wrote:

Thanks for your responses. Use of fuels with dunnage is consistent with what I am hearing. The PFCs connection was a question as to whether PFCs were used at an OB/OD site where diesel fuel was used since PFCs are used to put out fuel fires...but as I mentioned, I can't imagine PFCs being used because the purpose of the fuel was to promote the fire and SOP would be to let it do its thing and burn out.

Yes, Peterson AFB is one of the sites I am aware of.

Thanks for the Ft. Carson example, I may use it if I need to.

**From:** Anderson - CDPHE, Deb [mailto:[deb.anderson@state.co.us](mailto:deb.anderson@state.co.us)]  
**Sent:** Thursday, July 07, 2016 1:38 PM  
**To:** Shuster, Kenneth <[Shuster.Kenneth@epa.gov](mailto:Shuster.Kenneth@epa.gov)>  
**Subject:** Sub X call

On the Sub X call you asked about use of diesel at OB/OD areas. I am not aware of any current use of diesel at OB/OD in CO, but they certainly used various fuels in the past at the OB/OD areas, specifically at Pueblo Chemical Depot. We have several SWMUs where dunnage was burned along with munitions. The fuels were used to help ignite the dunnage. Is there some indication that PFCs are associated with diesel? I haven't heard that connection.

I am not aware of the use of OB/OD areas as a fire training area. The fire training areas we have are associated more closely with runways, or are in open areas away from any structures or disposal areas.

Fuels were routinely used in fire training areas where AFFF may have been used. You are probably aware that Peterson AFB is the source of a PFC plume near Colorado Springs. They had several fire training areas, plus an unlined landfill where contaminated soil from one of the fire training areas was disposed.

Just an FYI about Wainwright also. Fort Carson has a permitted OD unit on an active range. The Army tried making some similar arguments, but we made them permit the unit for treatment of items/munitions coming from off site or munitions from Fort Carson that were not safe to use or UXO not safe to BIP on an active range.

Deb Anderson

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